

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC  
RECORDING CORPORATION; BMG  
MUSIC; CAPITOL RECORDS, INC.;  
ELEKTRA ENTERTAINMENT GROUP  
INC.; INTERSCOPE RECORDS; LAFACE  
RECORDS LLC; MOTOWN RECORD  
COMPANY, L.P.; PRIORITY RECORDS  
LLC; SONY BMG MUSIC  
ENTERTAINMENT; UMG RECORDINGS,  
INC.; VIRGIN RECORDS AMERICA, INC.;  
and WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

LIME WIRE LLC; LIME GROUP LLC;  
MARK GORTON; GREG BILDSON; and  
M.J.G. LIME WIRE FAMILY LIMITED  
PARTNERSHIP,

Defendants.

06 Civ. 05936 (KMW)  
ECF CASE

**PLAINTIFFS' NOTICE OF MOTION AND  
MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

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Date: June 7, 2010

NOTICE TO THE COURT, DEFENDANTS AND THEIR COUNSEL OF RECORD:

Pursuant to the Protective Order entered in this action on March 8, 2007, Plaintiffs hereby move this Court to place under seal, until further order of this Court, the following documents:

- Exhibits 4-5 attached to the Declaration of Kelly M. Klaus in support of Plaintiffs' Motion for a Permanent Injunction
- Declaration of Professor Ellis Horowitz ("Horowitz Decl.) and exhibits thereto in support of Plaintiffs' Motion for a Permanent Injunction

On motion of the parties, the Court entered a Stipulated Protective Order (the "Protective Order") on March 8, 2007, concerning information produced in discovery, a copy of which is on file with the Court (Dkt. 21). The above-referenced documents attached as Exhibits to the Klaus Declaration and as Exhibits to the Horowitz Declaration have been designated by the parties as either Confidential or Confidential-Attorney's Eyes Only under the Protective Order. Further, the Horowitz Declaration discusses information that has been designated Confidential or Confidential-Attorney's Eyes Only.

Paragraph 14 of the Protective Order requires a party submitting Confidential or Confidential-Attorney's Eyes Only material to the Court to file such material under seal to protect it from disclosure. Accordingly, Plaintiffs respectfully request that the foregoing documents be maintained under seal until further order of this court..

Dated: June 7, 2010  
Los Angeles, CA

Respectfully submitted

/s/ Kelly M. Klaus  
Kelly M. Klaus

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